

LYONS & FLOOD, LLP

ATTORNEYS AT LAW

65 WEST 36<sup>TH</sup> STREET, 7<sup>TH</sup> FLOOR  
NEW YORK, NEW YORK 10018

TELEPHONE: (212) 594-2400

FAX: (212) 594-4589

JON WERNER

E-Mail: [jwerner@lyons-flood.com](mailto:jwerner@lyons-flood.com)

ADMITTED IN NEW YORK,  
NEW JERSEY

February 11, 2008

**BY MESSENGER**

Honorable Loretta A. Preska  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street, Room 1320  
New York, NY 10007

Re: Green S.A. v. Bin Johar General Trading LLC, *et al.*  
07 Civ. 5591 (LAP)  
Our file: 2600015

Dear Judge Preska:

We are attorneys for plaintiff in this Rule B attachment action and respectfully submit this joint letter on behalf of all counsel in this matter, pursuant to Your Honor's endorsed memo Order dated February 7, 2008.

Counsel have conferred and agreed to the following proposed discovery schedule:

1. All fact discovery to be completed no later than July 30, 2008.
2. Initial requests for production of documents to be served by April 22, 2008.
3. Interrogatories to be served by April 22, 2008.
4. Depositions to be completed by June 4, 2008.

5. Requests to Admit to be served no later than June 25, 2008.

NEW JERSEY OFFICE:

1495 MORRIS AVENUE

UNION, NJ 07083

TEL: (201) 569-4435 FAX: (201) 569-4438

CONNECTICUT OFFICE:

19 COVENTRY LANE

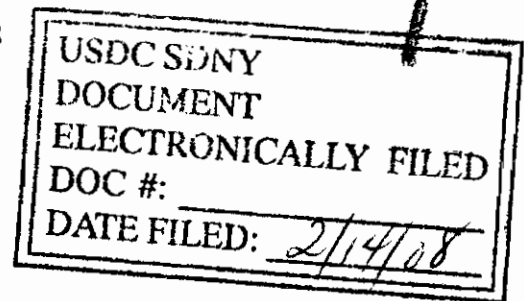
RIVERSIDE, CT 06878

TEL: (203) 661-2355 FAX: (203) 661-2577

RECEIVED

FEB 13 2008

LORETTA A. PRESKA  
U. S. DISTRICT JUDGE  
S. D. N. Y.



5A

Counsel shall inform the Court by letter no later than July 31 of their respective positions on dispositive motions

6. Dispositive motions to be served no later than August 11, 2008, with opposition papers to be served no later than August 21, 2008, and reply papers to be served no later than August 28, 2008.

We thank you for your attention to this matter.

Respectfully yours,

Lyons & Flood, LLP

SO ORDERED

*Loretta A. Preska*  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

By: Jon Werner

*February 13, 2008*  
BY TELEFAX

cc: J. David O'Brien, Esq.  
20 Vesey Street, Suite 1210  
New York, NY 10007

(212) 571-6166

William F. Dougherty, Esq.  
Burke & Parsons  
100 Park Avenue  
New York, NY 10017

(212) 221-1432

U:\kmh\docs\2600015\Correspondence\preska 04 ltr.doc